Supreme Court, U.S.
FILED
OCT 30 1980
MICHAEL RODAK, JR., CLERK

No. 80-438

IN THE

SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1980

GENEVIEVE GRAYDON,

Petitioner,

v.

PASADENA REDEVELOPMENT AGENCY,

Respondent,

ERNEST W. HAHN, INC.

Real Party in Interest.

ON PETITION FOR WRIT OF CERTIORARI TO THE COURT OF APPEAL OF THE STATE OF CALIFORNIA

SECOND APPELLATE DISTRICT

REPLY BRIEF

GENEVIEVE GRAYDON, in Propria Persona
99 South Raymond Avenue
Pasadena, California 91105
(213) 793-5429 Petitioner

LIST OF PARTIES

GENEVIEVE GRAYDON, individually and as representative of the taxpayers of the City of Pasadena,

Petitioner,

v.

THE PASADENA REDEVELOPMENT AGENCY, a public body corporate and politic; LOUIS SHEPARD, Executive Director of the Pasadena Redevelopment Agency;

Respondents,

ERNEST W. HAHN, INCORPORATED, a California Corporation,

Real Party in Interest.

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The entire BRIEF FOR RESPONDENT IN OPPOSITION comes under U. S. Supreme Court Rule 22.5:

Eugene B. Jacobs should not represent the Respondent Pasadena Redevelopment Agency. Petitioner believes he has a conflict of interest, having helped to create the redevelopment laws, while a California deputy attorney general. Also, he has an accountability problem as first signatory to the Opinion provided the Pasadena Redevelopment Agency (PRA) to contravene the competitive bidding law. (See LIST OF CORRECTIONS, 4, Petition, page 19, (P, p 19)). See serious breach in use of Kennedy v. Ross (P, p 21).

Questions Presented with Argument:

1. & A.: The 14th Amendment states: "... No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States;

..." This proscription is intrinsic in every law in every state. Citizens' right to petition under the First Amendment includes the right to "Petition for Writ of Mandamus and Declaratory Judgment and Injunction in Support Thereof" to enforce a state competitive bidding construction contract law to protect public funds. When one state law under California Code of Civil Procedure prevents enforcement of the competitive bidding law, thereby allowing an illegal construction contract, which is therefore null and void, to stand this abridges citizens' privilege to petition. Only the United States Supreme Court can determine which state law contravenes the 14th Amendment.

Further, in her pro per learning experience in Superior Court, Graydon v. Board of Directors, et al., NEC 17236, petitioner relied upon the 14th Amend-

ment. (See P,p 26).

2. & B.: Petitioner's petition for Writ of Certiorari was timely filed under Rule 20. 2. & 3. and Rule 33.7. It was docketed as of August 25, 1980, No. 80-438.

3. & C.: 1. Petition has reference to the official opinion of the California Court of Appeal, Second District. (See P,p. 24 & 67).

2. Nothing can be more concise than the 14th Amendment. The grounds are intrinsic in the State laws and when one law contravenes another only the Supreme Court can determine which law stands.

3. The entire petition sets forth as verbatim as the rules permit in space the intrinsic State statutory requirement to correct conflicting laws preventing citizens' right to protect public funds.

4. List of five corrections (P, 12-